

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11 Case
	)	
Old LC, Inc., <i>et al.</i> <sup>1</sup>	)	Case No. 19-11791 (BLS)
	)	
Debtors.	)	Jointly Administered

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Official Committee of Unsecured Creditors  
of Old LC, Inc., et al., for and on behalf of  
the estates of Old LC, Inc., et al.;

*Plaintiff,*

v.

Upfront V, LP, Breakwater Credit  
Opportunities Fund, L.P. Upfront GP V,  
LLC; Mark Suster; Dana Kibler; Gregory  
Bettinelli; Saif Mansour; Aamir Amdani;  
Eric Beckman; Darrick Geant; and Joseph  
Kaczorowski

*Defendants.*

Adv. No. 20-51002 (BLS)

**NOTICE OF DEPOSITION OF CHRISTOPHER DAVIS  
PURSUANT TO FED. R. CIV. PROC. 30**

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 30, made applicable herein by Federal Rules of Bankruptcy Procedure 7030 and 9014, Upfront V, LP, Upfront GP V, LLC, Mark Suster, Dana Kibler, and Gregory Bettinelli (collectively, the “Upfront Defendants”) in the above-captioned adversary proceeding, will take the deposition upon oral examination of Christopher Davis.

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<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14<sup>th</sup> Floor, Atlanta, Georgia 30309.

The deposition will take place on June 2, 2022, at 12:00 p.m. (Pacific Time) or at such other date and time as the parties may agree. The deposition will be conducted remotely.

With respect to the conduct of this remote deposition:

1. Counsel for the parties and their clients will be participating from various, separate locations;
2. The court reporter will administer the oath to the witness remotely;
3. Each participating attorney must be visible to all other participants, and their statements will be audible to all participants;
4. All exhibits will be provided simultaneously and electronically to the witness and all participants;
5. The court reporter will record the testimony;
6. The deposition may be videotaped; and
7. The deposition may be recorded electronically through the use of Realtime or a similar application.

Dated: May 26, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

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